

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

CAROLYN LYNN, individually and on behalf of all others similarly situated, ) Case No. 3:12-CV-01137  
Plaintiffs, )  
v. )  
ARTHUR F. HELF, H. LAMAR COX, )  
MICHAEL R. SAPP, FRANK PEREZ and )  
TENNESSEE COMMERCE BANCORP, )  
INC. and KraftCPAs PLLC, )  
Defendants. )  
)

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**LEAD PLAINTIFF'S MOTION FOR FINAL  
APPROVAL OF SETTLEMENT**

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Lead Plaintiff Grand Slam Capital Master Fund, Ltd. respectfully moves this Court pursuant to the Court's December 3, 2014 Order Preliminarily Approving Settlement and Providing For Notice (the "Preliminary Approval Order") (Dkt. No. 101) and Federal Rule of Civil Procedure 23 for an Order finally approving the proposed settlement of the above captioned caption as to defendants Arthur F. Helf, H. Lamar Cox, Michael R. Sapp, Frank Perez and Tennessee Commerce Bancorp, Inc., including the Plan of Allocation set forth in the Notice of Pendency of Proposed Settlement of Class Action disseminated to settlement class members pursuant to the Preliminary Approval Order.

This motion is based upon the accompanying Lead Plaintiff's Memorandum of Law in

Support of Motion for Final Approval of Settlement, the Declaration of Peter C. Harrar In  
Support of Motion For Final Approval of Settlement and Application of Lead Counsel For Award of  
Attorney's Fees and Reimbursement of Expenses, the Affidavit of Jose C. Fraga Regarding Mailing  
of the Notice and Proof of Claim Form and Publication of the Summary Notice, papers and filings  
on record in this matter and such additional evidence or argument as may be presented at the  
hearing scheduled for March 20, 2015.

DATED: January 12, 2015

Respectfully submitted,

/s/ Timothy L. Miles  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of January, 2015, the foregoing LEAD PLAINTIFF'S MOTION FOR FINAL APPROVAL OF SETTLEMENT was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

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